

- IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

5. Pursuant to Local Rule 26.2(b), good cause exists for entry of the consent judgment under seal because (a) the parties' settlement is contingent upon the entry of the consent judgment, (b) the parties' have agreed to terms of settlement and the consent judgment on the condition that it be filed under seal, and (c) the consent judgment is subject to being vacated if the Defendant complies with all terms of the consent judgment and the parties' Agreement.

6. Accordingly, pursuant to Local Rule 26.2(b), the parties jointly move this Court for entry of a sealing order directing that the consent judgment be filed under seal with the limited descriptive notation "Sealed Order."

7. The parties also move this Court to retain jurisdiction to enforce the terms of the Agreement and the Consent Judgment.

8. Pursuant to Local Rule 26.2(c), the parties will provisionally file the consent judgment under seal.

WHEREFORE, Plaintiff and Defendant respectfully move this honorable Court for entry of the consent judgment under seal, to retain jurisdiction to enforce the terms and conditions of the parties' settlement agreement and the consent judgment and for such other and further relief as this Court deems just and proper.

Dated: October 28, 2022

Respectfully submitted,

**BLUECREST CAPITAL INTERNATIONAL    OMNIGUIDE, INC.**  
**MASTER FUND LIMITED, in Voluntary**  
**Liquidation**

By: /s/ Antonio DeBlasio, Esq.  
Plaintiff's Counsel

By: /s/ Dylan J. Liddiard  
Defendant's Counsel

Antonio DeBlasio  
DEBLASIO & GOWER LLC  
2001 Midwest Road, Suite 100  
Oak Brook, Illinois 60523  
T: (630) 560-1124  
E: [deblasio@DGLLC.net](mailto:deblasio@DGLLC.net)

Dylan J. Liddiard (Lead Counsel)  
Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
T: (650) 565-3535  
E: [dliddiard@wsgr.com](mailto:dliddiard@wsgr.com)

**CERTIFICATE OF SERVICE**

The undersigned attorney, hereby certifies that on October 28, 2022, he served the foregoing **Agreed Motion for Entry of Consent Judgment Under Seal** via the CM/ECF system maintained by the Clerk of the U.S. District Court upon the counsel of record for the parties as indicated below:

**Counsel for Defendant, OmniGuide, Inc.**

Dylan J. Liddiard (Lead Counsel)  
Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
T: (650) 565-3535  
E: [dliddiard@wsgr.com](mailto:dliddiard@wsgr.com)

Danielle J. Gould (Local Counsel)  
Burke Warren Mackay & Serritella P.C.  
330 N. Wabash Ave., 21<sup>st</sup> Floor  
Chicago, IL 60611-3607  
T: (312) 840-7000  
E: [dgould@burkelaw.com](mailto:dgould@burkelaw.com)

/s/ Antonio DeBlasio, Esq.

Attorney for Plaintiff, BlueCrest Capital  
International Master Fund Limited, in Voluntary  
Liquidation